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**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA**

ROQUE MARTINEZ,)	Case No. 1:24-cv-01245-JLT-BAM
Plaintiff,)	STIPULATION AND PROPOSED
vs.)	ORDER FOR EXTENSION OF
)	TIME
CAROLYN COLVIN, ACTING)	
COMMISSIONER OF SOCIAL)	
SECURITY ¹ ,)	
Defendant.)	

Pending the Court's approval, IT IS HEREBY STIPULATED, by and between the parties through their respective counsel of record, with the Court's approval, that Plaintiff shall have a 60-day extension of time, from January 15, 2025 to March 17, 2025, for Plaintiff to serve on defendant with PLAINTIFF'S

¹ Carolyn Colvin became the Commissioner of Social Security on November 30, 2024. Pursuant to Rule 25(d) of the Federal Rules of Civil Procedure, Carolyn Colvin should be substituted for Martin O'Malley as the defendant in this suit. No further action need be taken to continue this suit by reason of the last sentence of section 205(g) of the Social Security Act, 42 U.S.C. § 405(g).

1 MOTION FOR SUMMARY JUDGMENT. All other dates in the Court's
2 Scheduling Order shall be extended accordingly.

3 This is Plaintiff's first request for an extension of time. Plaintiff respectfully
4 states that the requested extension is necessary due several merit briefs being due
5 on the same week. For the weeks of January 13, 2025 and January 20, 2025,
6 Plaintiff's Counsel has eleven merit briefs due. Counsel requires additional time to
7 brief the issues thoroughly for the Court's consideration. Defendant does not
8 oppose the requested extension. Counsel apologizes to the Defendant and Court
9 for any inconvenience this may cause.

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11 Respectfully submitted,

12 Dated: December 30, 2024 PENA & BROMBERG, ATTORNEYS AT LAW
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14 By: /s/ Jonathan Omar Pena
15 JONATHAN OMAR PENA
16 Attorneys for Plaintiff
17

18 Dated: December 30, 2024 PHILLIP A. TALBERT
19 United States Attorney
20 MATHEW W. PILE
21 Associate General Counsel
22 Office of Program Litigation
23 Social Security Administration

24 By: */s/ Justin Lane Martin
25 Justin Lane Martin
26 Special Assistant United States Attorney
27 Attorneys for Defendant
28 (*As authorized by email on December 27, 2024)

ORDER

Pursuant to stipulation, and cause appearing, Plaintiff shall have a 60-day extension of time to March 17, 2025, to file a Motion for Summary Judgment. All other deadlines in the Court's Scheduling Order are modified accordingly. No further extensions of time will be granted absent a demonstrated showing of good cause.

IT IS SO ORDERED.

Dated: January 2, 2025

/s/ Barbara A. McAuliffe
UNITED STATES MAGISTRATE JUDGE